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### REMARKS

This is a full and timely response to the outstanding final Office Action mailed October 20, 2005. Reconsideration and allowance of the application and presently pending claims, as amended, are respectfully requested.

1. Response to Rejection of Claims 1-20 Under 35 U.S.C. § 103(a)

Claims 1-20 have been rejected under 35 U.S.C. § 103(a) as being anticipated by *Zhou* (WO 02/31814) in view of *Noshora* (EP 0838765). It is well-established at law that, for a proper rejection of a claim under 35 U.S.C. § 103 as being obvious based upon a combination of references, the cited combination of references must disclose, teach, or suggest, either implicitly or explicitly, all elements/features/steps of the claim at issue. See, e.g., *In Re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

a. Claim 1

As provided in independent claim 1, Applicants claim:

A method for conducting a search for stored information, comprising the steps of:  
presenting a user interface to a user;  
*receiving an identification of a particular search language in which to search from the user, the identification designating which particular database of a plurality of language databases is to be searched and which language is featured within the user interface;*  
receiving a search query; and  
*conducting a search of the particular database that contains information written in the identified language.*

(Emphasis added).

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Zhou* in view of *Nosohara* does not disclose, teach, or suggest at least the features of "receiving an identification of a particular search language in which to search from the user, the identification designating which particular database of a plurality of language databases is to be searched and which language is featured within the user interface" and "conducting a search of the particular database that

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contains information written in the identified language," as recited and emphasized above.

Rather, *Zhou* discloses at most an "apparatus for a language independent, voice-based Internet or Intranet search system." Page 2, lines 21-22. For example, *Zhou* "automatically identif[ies] the language spoken by the user." Page 2, lines 25-29. As taught by *Zhou*, "[a]utomatic language identification allows users speaking different languages to search the Internet or an intranet using a single system via their own voice without especially telling the system what language they are speaking." Page 3, lines 24-26 (Emphasis added). Therefore, *Zhou* fails to teach or suggest "receiving an identification of a particular search language in which to search from the user," as recited in claim 1. Further, *Zhou* discloses a system where multiple language databases are used and the search results are initially returned in different languages. Page 7, lines 18-20. Therefore, a plurality of language databases are searched by the system in *Zhou* in response to a search request.

Regarding *Nosohara*, it appears to disclose that a user chooses a language to be used in designating search conditions in one step and the user designates databases to be searched in a different step. See col. 4, lines 35-42 and steps 100 & 101 of Fig. 2. Therefore, *Nosohara* seemingly allows a language database to be searched that is different from the language designated for search conditions.

As a result, the proposed combination of *Zhou* in view of *Nosohara* does not teach or suggest at least "receiving an identification of a particular search language in which to search from the user, the identification designating which particular database of a plurality of language databases is to be searched and which language is featured within the user interface" and "conducting a search of the particular database that contains information written in the identified language," since the cited references disclose that a particular language database and the language featured in a user interface are not based upon a user-designation of a single identification of a particular search language.

Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Zhou* in view of *Nosohara* has not been made. Therefore, the rejection of claim 1 should be withdrawn.

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b. Claims 2-9

Because independent claim 1 is allowable over the cited art of record, dependent claims 2-9 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that the dependent claims 2-9 contain all the steps and features of independent claim 1. For at least this reason, the rejection of claims 2-9 should be withdrawn.

Additionally and notwithstanding the foregoing reasons for allowability of claims 2-9, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

Accordingly, the rejections to these claims should be withdrawn.

c. Claim 10

As provided in independent claim 10, Applicants claim:

A universal search engine, comprising:  
means for interfacing with a user; and  
*means for searching one of several different available language databases in one of several different available search languages identified by the user, wherein a particular language identified by the user designates a language featured by the means for interfacing and a particular language database used by the means for searching.*

(Emphasis added).

Applicants respectfully submit that independent claim 10 is allowable for at least the reason that *Zhou* in view of *Nosohara* does not disclose, teach, or suggest at least "means for searching one of several different available language databases in one of several different available search languages identified by the user, wherein a particular language identified by the user designates a language featured by the means for interfacing and a particular language database used by the means for searching," as recited and emphasized above.

Rather, *Zhou* discloses at most an "apparatus for a language independent, voice-based Internet or Intranet search system." Page 2, lines 21-22. For example, *Zhou* "automatically identif[ies] the language spoken by the user." Page 2, lines 25-

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29. As taught by *Zhou*, "[a]utomatic language identification allows users speaking different languages to search the Internet or an intranet using a single system via their own voice without especially telling the system what language they are speaking." Page 3, lines 24-26 (Emphasis added). Therefore, *Zhou* fails to teach or suggest "means for searching one of several different available language databases in one of several different available search languages identified by the user, wherein a particular language identified by the user designates a language featured by the means for interfacing and a particular language database used by the means for searching," as recited in claim 10. Further, *Zhou* discloses a system where multiple language databases are used and the search results are initially returned in different languages. Page 7, lines 18-20. Therefore, a plurality of language databases are searched by the system in *Zhou* in response to a search request.

Regarding *Nosohara*, it appears to disclose that a user chooses a language to be used in designating search conditions in one step and the user designates databases to be searched in a different step. See col. 4, lines 35-42 and steps 100 & 101 of Fig. 2. Therefore, *Nosohara* seemingly allows a language database to be searched that is different from the language designated for search conditions.

As a result, the proposed combination of *Zhou* in view of *Nosohara* does not teach or suggest at least "means for searching one of several different available language databases in one of several different available search languages identified by the user, wherein a particular language identified by the user designates a language featured by the means for interfacing and a particular language database used by the means for searching," since the cited references disclose that a particular language database and the language featured in a user interface are not based upon a user-designation of a single identification of a particular search language. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Zhou* in view of *Nosohara* has not been made. Therefore, the rejection of claim 10 should be withdrawn.

d. Claims 11-15

Because independent claim 10 is allowable over the cited art of record, dependent claims 11-15 (which depend from independent claim 10) are allowable as a matter of law for at least the reason that the dependent claims 11-15 contain all the

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elements and features of independent claim 10. For at least this reason, the rejection of claims 11-15 should be withdrawn.

Additionally and notwithstanding the foregoing reasons for allowability of claims 11-15, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

e. Claim 16

As provided in independent claim 16, Applicants claim:

Search engine software stored on a computer readable medium, comprising:

logic configured to present a user interface to a user;

*logic configured to receive an identification of a particular search language from the user;*

logic configured to receive a search query with the user interface; and

*logic configured to search a particular database of a plurality of language databases that contains information in the identified language, wherein the identified language is featured within the user interface.*

(Emphasis added).

Applicants respectfully submit that independent claim 16 is allowable for at least the reason that *Zhou* in view of *Nosohara* does not disclose, teach, or suggest at least "logic configured to receive an identification of a particular search language from the user" and "logic configured to search a particular database of a plurality of language databases that contains information in the identified language, wherein the identified language is featured within the user interface," as recited and emphasized above.

Rather, *Zhou* discloses at most an "apparatus for a language independent, voice-based Internet or Intranet search system." Page 2, lines 21-22. For example, *Zhou* "automatically identif[ies] the language spoken by the user." Page 2, lines 25-29. As taught by *Zhou*, "[a]utomatic language identification allows users speaking different languages to search the Internet or an intranet using a single system via their

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own voice without especially telling the system what language they are speaking." Page 3, lines 24-26 (Emphasis added). Therefore, *Zhou* fails to teach or suggest "logic configured to receive an identification of a particular search language from the user" and "logic configured to search a particular database of a plurality of language databases that contains information in the identified language, wherein the identified language is featured within the user interface," as recited in claim 16. Further, *Zhou* discloses a system where multiple language databases are used and the search results are initially returned in different languages. Page 7, lines 18-20. Therefore, a plurality of language databases are searched by the system in *Zhou* in response to a search request.

Regarding *Nosohara*, it appears to disclose that a user chooses a language to be used in designating search conditions in one step and the user designates databases to be searched in a different step. See col. 4, lines 35-42 and steps 100 & 101 of Fig. 2. Therefore, *Nosohara* seemingly allows a language database to be searched that is different from the language designated for search conditions.

As a result, the proposed combination of *Zhou* in view of *Nosohara* does not teach or suggest at least "logic configured to receive an identification of a particular search language from the user" and "logic configured to search a particular database of a plurality of language databases that contains information in the identified language, wherein the identified language is featured within the user interface," since the cited references disclose that a particular language database and the language featured in a user interface are not based upon a user-designation of a single identification of a particular search language. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Zhou* in view of *Nosohara* has not been made. Therefore, the rejection of claim 16 should be withdrawn.

f. Claims 17-20

Because independent claim 16 is allowable over the cited art of record, dependent claims 17-20 (which depend from independent claim 16) are allowable as a matter of law for at least the reason that the dependent claims 17-20 contain all the features of independent claim 16. For at least this reason, the rejection of claims 17-20 should be withdrawn.

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Additionally and notwithstanding the foregoing reasons for allowability of claims 17-20, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

Accordingly, the rejections to these claims should be withdrawn.

### **CONCLUSION**

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

  
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